

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

LAKENYA MCGHEE-TWILLEY,	§	
individually, and as next-of-kin to the	§	
deceased, MARKTAVIOUS TWILLEY,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Case 3:23-cv-00077
	§	
CORECIVIC OF TENNESSEE, LLC,	§	JURY DEMANDED
as owner and operator of TROUSDALE	§	
TURNER CORRECTIONAL CENTER,	§	
and MARTIN FRINK, LARODERICK	§	
MCDAVID, DENNIS KAISER,	§	
	§	
<i>Defendants.</i>	§	

PLAINTIFF’S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Comes now the Plaintiff, through counsel, and pursuant to the Court’s protective order (Doc. 34 at 4–5), Local Rule 5.03(a)–(b), and Local Rule 7.01(a), respectfully moves to file the following documents under seal in connection with the Plaintiff’s forthcoming *Motion to Hold the Tennessee Department of Correction in Contempt*:

1. A document produced by District Attorney Lawson that is bates-numbered Lawson Final_000042–45 (**Ex. 1**);
2. Documents produced by the TDOC that are bates-numbered TDOC1–62 (**Ex. 2**), TDOC98–800 (**Ex. 3**), TDOC801–1500 (**Ex. 4**), TDOC1501–2127 (**Ex. 5**), and TDOC2133–2573 (**Ex. 6**).

The Plaintiff, who is using the documents, is not the party that requests restriction of access; she did not designate the documents confidential; and she does not believe that

any of them merits sealing, either in whole or in part. The Plaintiff has also conferred with the designating parties regarding this filing, who have indicated that they are not agreeable to changing their confidentiality designations or redaction. Thus, the Plaintiff has filed the relevant documents under seal, and under Local Rule 5.03(b), the burden of meeting the requirements for sealing will fall to the designating parties.

Advance notice of this motion was provided to the designating parties in accordance with the Parties' protective order, and the designating parties are being served with this motion upon filing.

Respectfully submitted,

/s/ Daniel A. Horwitz

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of December, 2023, a copy of the foregoing and all exhibits and attachments were sent via CM/ECF, or via email, to:

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